## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re LEHMAN BROTHERS SECURITIES AND ERISA LITIGATION

Case No. 09-MD-2017 (LAK)

This Document Applies To:

ECF CASE

In re Lehman Brothers Equity/Debt Securities Litigation, 08-CV-5523-LAK

# THE STRUCTURED PRODUCTS CLASS REPRESENTATIVES' NOTICE OF MOTION FOR FINAL APPROVAL OF SETTLEMENT WITH UBS FINANCIAL SERVICES INC. AND APPROVAL OF PLAN OF ALLOCATION

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e), this Court's September 16, 2013 Order Concerning Proposed Settlement With UBS Financial Services, Inc., and based upon the accompanying memorandum of law, the declaration of Daniel C. Girard, all the other papers and proceedings herein, and the hearing the Court will conduct on December 10, 2013 at 4:30 p.m. or at such other time as set by the Court, the Structured Products Class Representatives hereby move the Court to grant final certification of the settlement class and for entry of a judgment approving the proposed settlement and the proposed plan of allocation as fair, reasonable and adequate.

Dated: November 5, 2013

Respectfully submitted,

### **GIRARD GIBBS LLP**

#### /s/ Daniel C. Girard

Daniel C. Girard
Jonathan K. Levine
Amanda M. Steiner
Dena C. Sharp
601 California Street, Floor 14
San Francisco, CA 94108
Tel: (415) 981-4800
Fax: (415) 981-4846
dcg@girardgibbs.com
jkl@girardgibbs.com
as@girardgibbs.com
chc@girardgibbs.com

John A. Kehoe 711 Third Avenue, 20th Floor New York, NY 10017 Tel: (212) 867-1721 Fax: (212) 867-1767 jak@girardgibbs.com

Class Counsel and Counsel for Plaintiffs Mohan Ananda, Richard Barrett, Neel Duncan, Nick Fotinos, Stephen Gott, Karim Kano, Barbara Moskowitz, Ronald Profili, Joe Rottman, Grace Wang and Miriam Wolf

ZWERLING, SCHACHTER & ZWERLING, LLP
Susan Salvetti
Justin M. Tarshis
41 Madison Avenue
New York, New York 10010
Telephone: (212) 223-3900
Facsimile: (212) 371-5969
ssalvetti@zsz.com
jtarshis@zsz.com

Counsel for Plaintiffs Ed Davis, Rick Fleischman, Gastroenterology Associates, Ltd. Profit Sharing Plan FBO Charles M.

Brooks M.D., Arthur Simons, and Juan Tolosa

LAW OFFICES OF JAMES V. BASHIAN, P.C.

James V. Bashian 500 Fifth Avenue, Suite 2700 New York, New York 10110 Telephone: (212) 921-4110 Facsimile: (212) 921-4229

Counsel for Plaintiff David Kotz

## BONNETT FAIRBOURN FRIEDMAN & BALINT, P.C.

Andrew Friedman 2901 North Central Avenue, Suite 1000 Phoenix, Arizona 85012 Telephone: (602) 274-1100 Facsimile: (602) 274 1199

TIFFANY & BOSCO P.A. Richard G. Himelrick 2525 East Camelback Road Phoenix, Arizona 85016 Telephone: (602) 255-6000

Facsimile: (602) 255-0103

Counsel for Plaintiff Shea-Edwards Limited Partnership